

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

December 9, 2019

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

In accordance with the Court's November 20, 2019 Order, ECF No. 5297, as modified, the Plaintiffs' Executive Committees ("PECs"), with the consent of the Department of Justice ("DOJ"), write to submit the parties' joint proposal for briefing on Plaintiffs' further motion to compel directed to the Federal Bureau of Investigation ("FBI"). The parties respectfully propose the following briefing schedule and structure:

1. Plaintiffs will file their motion to compel and memorandum of law in support of same, not to exceed 25 pages, on or before January 10, 2020;
2. The FBI will file its cross motion for a protective order and memorandum of law in opposition to Plaintiffs' motion to compel and in support of the motion for a protective order, not to exceed 35 pages, on or before February 7, 2020;
3. Plaintiffs will file their memorandum of law in opposition to the FBI's motion for a protective order and in further support of their motion to compel, not to exceed 25 pages, on or before February 21, 2020; and
4. The FBI will file its reply brief in support of its motion for a protective order, not to exceed 15 pages, on or before March 6, 2020.

The PECs, DOJ and FBI respectfully request that the Court approve the proposal set forth above.

The Honorable Sarah Netburn
December 9, 2019

Respectfully submitted,

MOTLEY RICE LLC

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*On behalf of the MDL 1570 Plaintiffs' Exec.
Committee for Personal Injury and Death
Claims*

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*On behalf of the MDL 1570 Plaintiffs' Exec.
Committee for Commercial Claims*

cc: The Honorable George B. Daniels (via ECF)
All Counsel of Record (via ECF)

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*On behalf of the MDL 1570 Plaintiffs' Exec.
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Claims*